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FAA-00-7909-35

Dear Sir,

We are submitting to your consideration the following comments:

1) According to the NPRM, the burnthrough requirement shall be applicable only to insulation located at lower half of the fuselage. We are proposing to use the center line of the fuselage or the bottom line of the passenger windows (the lower of them) as the limit criteria, as stretched acrylic is much less resistant to fire burnthrough than the insulation. It is our understanding that any insulation material installed above the bottom line of the passenger windows will not contribute for the purpose of the proposed burnthrough requirement.

> Proposed text, #25.856 [Insulation materials - ...installed either in the lower half of the airplane fuselage or below the bottom line of the passenger windows (whichever is lower)...]

2) Concerning the means of fastening the insulation blankets to the test rig, paragraph (c)(3)iv of the proposed part VII of appendix F [iv) Installation on test frame. The blanket test specimens must be attached to the test frame using 12 steel spring type clamps as shown in figure 7.] imposes the use of steel spring clamps. However, according to the new proposed # 25.856 [Insulation materials -? insulation materials (including the means of fastening the materials to the fuselage) installed in the lower half of the airplane fuselage must...] of the same NPRM, for newly manufactured airplanes it is required that fastening means, used in the actual installation, should be considered when performing tests.
It is not clear enough for us, and perhaps for many others, what is the main objective of the proposed test: to test the insulation material with steel spring clamps, or to test the insulation and also the fasteners actually used in the aircraft which may be made of plastic for example.

3- For most of the aircraft designs, a visco-elastic material is stuck on the internal side of the skin. This material is a composite sheet of synthetic foam covered by an aluminum foil, and is present in approximately 10% of the skin area.
How should such insulation materials, that are stuck on the aluminum skin, be considered?

Thank you for your attention
Best Regards

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